

1 JASON M. FRIERSON
2 United States Attorney
3 District of Nevada
3 Nevada Bar No. 7709

4 MARCELO ILLARMO (MABN 670079)
5 Special Assistant United States Attorney
6 Office of the General Counsel
7 Social Security Administration
8 6401 Security Boulevard
Baltimore, Maryland 21235
Telephone: (510) 970-4822
E-Mail: Marcelo.Illarmo@ssa.gov

9 Attorneys for Defendant

10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 SHANE CROMWELL)
13 Plaintiff,)
14 v.) Case No.: 2:24-cv-00064-NJK
15 MARTIN O'MALLEY,) UNOPPOSED MOTION FOR EXTENSION
16 Commissioner of Social Security,) OF TIME TO RESPOND TO PLAINTIFF'S
17 Defendant.) BRIEF (FIRST REQUEST)

18
19 Defendant Martin O'Malley, Commissioner of Social Security ("Defendant") respectfully
20 requests that the Court extend the time for Defendant to file his response to Plaintiff's opening brief,
21 due on April 29, 2024, by 30 days, through and including May 29, 2024, with all other deadlines
22 extended accordingly.

23 Defendant respectfully requests this extension because undersigned counsel needs additional
24 time to determine whether additional briefing is necessary. This request is made in good faith with
25 no intention to unduly delay the proceedings.
26

///

1 Counsel for Defendant conferred with Plaintiff's counsel, who has no opposition to this
2 motion, on April 24, 2024.

3
4
5 Dated: April 24, 2024

6 Respectfully submitted

7 JASON M. FRIERSON
8 United States Attorney

9 /s/ Marcelo Illarmo
10 MARCELO ILLARMO
11 Special Assistant United States Attorney

12 IT IS SO ORDERED:

13 
14 NANCY J. KOPPE
15 UNITED STATES MAGISTRATE JUDGE

16 DATED: April 26, 2024